

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: JIM SARIC
Date: 9/24/92

Background Facility Information

Facility Name: UNISYS SPERRY (PARAMAX CORPORATION)
EPA Identification No.: MND 000 823 914
Location (City, State): EAGAN, MN
Facility Priority Rank: ~~Low~~ High

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

ENTIRE FACILITY:
CONTAINER STORAGE
TANK STORAGE

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?
- ☐ No corrective action activities initiated (Go to 5)
- ☒ RCRA Facility Assessment (RFA) or equivalent completed
- ☒ RCRA Facility Investigation (RFI) underway
- ☐ RFI completed
- ☐ Corrective Measures Study (CMS) completed
- ☐ Corrective Measures Implementation (CMI) begun or completed
- ☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
☐ Post-closure permit
☐ Enforcement order
☒ Other (Explain)

CORRECTIVE ACTION AGREEMENT
BETWEEN STATE & GENERATOR

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
☒ No
☐ Uncertain; still underway
☐ Not required

Additional explanatory notes:

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- ☒ Ground water
☐ Surface water
☐ Air
☒ Soils

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater: CHROMIUM

Surface water: CHROMIUM

Air:

Soils:

- ☒ No
☐ Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 8a)
☒ No
☐ Uncertain

Additional explanatory notes:

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 9)
☒ No
☐ Uncertain

Additional explanatory notes:

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

- ☐ Solid
☐ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☒ Dissolved in ground water or surface water
☐ Gaseous
☐ Other SOIL CONTAMINATION

13. Which of the following major chemical groupings are of concern at the facility?

- ☐ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☐ Other organics
☒ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

- ☒ Yes; Indicate possible course of action.

- ☐ No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

- ☐ Yes
☒ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

- ☐ Yes
☒ No

**Timing and Other Procedural Issues
Associated with Stabilization**

16. Can stabilization activities be implemented more quickly than the final corrective measures?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☐ Yes
- ☒ No, not feasible
- ☐ No, not required

Explain final decision, using additional sheets if necessary.

SOIL CONTAMINATION EXISTS UNDER A BUILDING.

THE GROUNDWATER CONTAMINATION EXISTS AT LEVELS BELOW MCL'S.

Part B



Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155-3898

Telephone (612) 296-6300



October 26, 1990

Mr. Charles Slaustas
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Slaustas:

RE: Unisys, Eagan - MND000823914
Resource Conservation and Recovery Act Facility Assessment (RFA)

Please find enclosed the RFA for Unisys Corporation located in Eagan, Minnesota. This RFA was written since one was not performed at the time of the initial RCRA permit issuance. The Minnesota Pollution Control Agency (MPCA) staff recommend continued ground water investigation to define the ground water flow direction, extent of chromium contamination, and associated solid waste management unit (SWMU) source(s).

As you know, the Facility is undergoing closure and simultaneously preparing a RCRA Facility Investigation (RFI) Workplan. Pending completion of the RFI, a Corrective Action Agreement may be appropriate to administer oversight of remediation after the Facility undergoes a change in status to a Large Quantity Generator.

You may contact Dan Card at 612/642-0421 regarding any comments or questions related to this RFA.

Sincerely,


Bruce W. Brott, P.E., Supervisor
Permit and Review Unit
Regulatory Compliance Section
Hazardous Waste Division

BWB:lm

Enclosure

cc: Mark Wilson, Unisys, Eagan
Joel Morbito, U.S. Environmental Protection Agency, Region V, Chicago

**RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY ASSESSMENT for**

**UNISYS CORPORATION
PARK FACILITY
3333 PILOT KNOB ROAD
EAGAN, MINNESOTA 55164
MND000823914**

**Prepared For:
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604**

**Prepared By:
Minnesota Pollution Control Agency
520 Lafayette Road
Saint Paul, Minnesota 55155**

OCTOBER, 1990

RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY ASSESSMENT FOR
UNISYS, CORPORATION
3333 Pilot Knob Road
Eagan, Minnesota 55121

I. BACKGROUND INFORMATION

The Unisys Corporation Park facility (Company) located in Eagan, Minnesota, is currently undergoing a Facility closure. The Company was issued a Resource Conservation and Recovery Act RCRA permit on October 2, 1985, which expired on October 2, 1990. This RCRA Facility Assessment (RFA) is being conducted to identify all solid waste management units (SWMUs) and releases or potential releases of hazardous waste or constituents from SWMUs requiring further investigation. No RFA was done at the time of the October 2, 1985, permit issuance. This RFA documents the findings from the preliminary review and visual site inspection (PR/VSI). The VSI was conducted on August 8, 1990. References used to prepare this report are included in part XI.

All hazardous waste containers accumulated beyond 90 days have been shipped off-site. The Minnesota Pollution Control Agency (MPCA) staff have received partial closure certification consisting of the independent registered professional engineer's report (attached) certifying closure of the permitted hazardous waste container storage areas. The two (2) permitted 8,000 gallon secondary containment tanks associated with the acid and alkali hazardous waste storage rooms are scheduled to be removed by the end of 1990. Upon removal of these two tanks, and decontamination of underlying soil if necessary, the engineer will certify closure of these two tanks. The owner/operator will also be required to certify closure of all hazardous waste container storage areas including the two tanks. Upon closure certification by an independent engineer and the owner/operator, the Facility will be closed and the Company will

maintain their status as a hazardous waste Large Quantity Generator. Therefore, after Facility closure, all presently permitted storage rooms or areas will be used to store hazardous waste for a period of less than 90 days.

During the Facility closure, a RCRA Facility Investigation (RFI) is being implemented. After certification of closure and change in status, all corrective action activities will be regulated by a Corrective Action Agreement to be developed between the Company and the MPCA.

The Company manufactures computer systems. Hazardous wastes are generated from copper etching, copper and solder plating, and chemical cleaning associated with the production of semiconductors and from multiple process laboratories used for research and development. The Company maintains a wastewater pretreatment system for elementary neutralization and metal precipitation of rinse waters. This system is exempt from the RCRA permitting requirements, but is subject to the Metropolitan Waste Control Commission sanitary sewer discharge standards. The Company maintains sewer permit #0123.

II. ENVIRONMENTAL SETTING

The Company is located in the northwest corner of the City of Eagan, approximately two (2) miles east of the Minnesota River and ten (10) miles south-southwest of downtown St. Paul, Minnesota (see figure 1, LBG).

The facility property is characterized by rolling topography at a mean sea level elevation of around 900 feet, roughly 200 feet above the floor of the Minnesota River Valley, well above the 100 year flood plain.

Total relief across the site is about 70 feet with a relatively flat open field to the north side of the plant that slopes gently towards a pond to the North. The building is surrounded by parking lots to the north, south and west.

Storm water runoff from the roof and parking lots is conveyed to the small pond 1,200 feet to the north. All other waste waters are discharged to the Seneca Metropolitan Waste Control Commission treatment facility.

III. CLIMATE

The climate is predominantly continental with large seasonal temperature changes. The average annual temperature is 44.7° Fahrenheit, with an average maximum of 54.2° Fahrenheit and minimum of 35.2° Fahrenheit. Extremes of 108° Fahrenheit and -34° Fahrenheit have been recorded at the nearby Twin Cities International Airport.

Snow cover typically occurs from early December through early March and averages six (6) to eight (8) inches, with a total snow fall average of 48 inches per year.

IV. WATER USE

The City of Eagan has several municipal wells in the area of the facility that utilize ground water from the Prairie du Chien-Jordan bedrock aquifer. These wells are screened into the Jordan Sandstone at depths greater than 350 feet below ground surface. Eagan's Municipal well # 7 is located on the west side of the facility property, and is screened into the Jordan aquifer at a depth of 393 feet below surface.

Residential water needs are met by the City of Eagan's municipal water supply system.

V. GEOLOGY AND HYDROGEOLOGY

The Company is located on glacial till and outwash that ranges in thickness from 300 to 400 feet. The outwash deposits consist primarily of well sorted sand with gravel lenses. The till materials are composed primarily of sandy clays, and clays. Outwash and till materials are interbedded and occur

with variable thickness and extent. Directly beneath the glacial material lies the Prairie Du Chien Dolomite and Jordan Sandstone bedrock which serve as the water supply for the City of Eagan, Minnesota.

In May and June of 1988, Unisys conducted an Environmental Assessment of the facility, which consisted of the taking of four (4) soil borings and installation of four (4) monitoring wells. The sediments encountered in test borings and monitoring wells, consist primarily of silty sand, sandy clay, and sand interbedded with gravel and clay lenses. These deposits vary in thickness and extent and do not appear to be interconnected over any significant portion of the site (see figures 3 & 4, LBG Report).

VI. GROUND WATER MONITORING

Unisys installed four monitoring wells around the facility building to characterize ground water quality at the site, and to determine ground water depth and flow direction beneath the facility. The monitoring wells were screened into the first saturated zone encountered, which varies as much as 12 to 92 feet below grade, as observed in monitoring wells MW-3 and MW-4. Based on the depths of water elevations in the four (4) wells, the wells appear to be in different water-bearing zones. Ground water flow directions have not been accurately determined due to the lack of contiguous aquifers caused by the variability in geologic materials beneath the site (see figure 5, LBG).

Two rounds of ground water samples were conducted in June and July of 1988. Ground water samples were analyzed for the presence of: volatile organic compounds, fuel oil constituents, and selected dissolved metals.

No volatile organic compounds or fuel oil constituents were detected in the wells; however, chromium was detected at elevated concentrations in MW-4. Subsequent monitoring has shown continued detections of chromium in MW-4 at concentrations around 60 parts per billion.

MW-4 is located adjacent to the northwest corner of the building between the waste and chemical storage areas. MW-4 is screened at a depth of 92 to 102 feet below grade in a sandy clay material and is the deepest monitoring well at the site.

The location and depths of monitoring wells at the site do not provide adequate information with regard to ground water flow direction or in determining the horizontal and vertical extent of chromium contamination.

At this time the source for the chromium contamination detected in MW-4 has not been identified by Unisys. However, one possible source has been identified as the on-site waste water treatment sump. In the mid-1980's the floor and pit of the sump were replaced with a Buck and Membrane liner due to excessive corrosion of the sump. No records of soil testing or investigation are available that suggest an evaluation or clean up of soils beneath the sump occurred.

VII. IDENTIFICATION AND DESCRIPTION OF SOLID WASTE MANAGEMENT UNITS

(See Attached Figure D-2 of Part B Application)

RCRA PERMITTED UNITS - FACILITY STORAGE > 90 DAYS

A. Flammable Solvents Storage Room

This storage room contains hazardous wastes such as alcohols, acetone, methyl ethyl ketone, and xylene. The room has a secondary containment system that consists of a cement dike and grated floor trench. The floor trench previously drained to two (2), 8,000 gallon underground storage tanks (USTs), located outside the building. The floor trench has been sealed and no longer drains to the USTs. The room has a maximum permitted storage capacity of four (4) drums. Lab packing of flammable solvents occurred in this room.

B. Non-Flammable/Oxidizer Storage Room

Reclaimed chlorinated hazardous waste solvents such as trichloroethane, Freon, trichloroethylene, and methylene chloride are contained in this storage room. The room has a permitted storage capacity of three (3) drums. The secondary containment system consists of a diked floor and floor trench that previously drained to the two (2), 8,000 gallon USTs discussed in item VII.1. above and VII.5. below. The floor trench is sealed and no longer drains to the two (2) USTs. Lab packing of non-flammable solvents occurred in this room.

C. Metal Hydroxide Sludge Storage Area

This area is located in the sub-basement of the building. Metal hydroxide sludge generated from the wastewater pretreatment system is stored in this area which has a permitted storage capacity of six (6) drums. A grated floor trench serves as the spill containment system. The floor trench is routinely pumped to a pair of 10,000 gallon flow through tanks that are connected to the wastewater pretreatment elementary neutralization system.

D. Toxic Waste Storage Area

This storage area is located in the sub-basement and is used to store miscellaneous toxic waste such as Polychlorinated biphenyls (PCBs) and oils and has a permitted storage capacity of two (2) drums. An adjacent floor trench, that serves as the secondary containment system, can be pumped to the wastewater pretreatment elementary neutralization system.

E. Underground Secondary Containment Tanks

This unit consists of two (2), 8,000 gallon USTs located beneath an asphalt roadway outside the northwest corner to the building. These tanks were used to collect any spill overflow from the acid and alkali storage rooms. Currently they are not in use and scheduled for removal as part of the Facility

closure.

NON-RCRA PERMITTED UNITS - GENERATOR STORAGE < 90 DAYS

A. Acid Storage Room

This storage area contains hazardous materials and waste such as chromic acid etcher and strippers. This room incorporates an acid storage area which has a floor trench and a floor sump that previously flowed to the two (2) permitted 8,000 gallon USTs discussed above in item VII.5. The floor sump currently drains to the wastewater pretreatment system.

B. Alkali/Neutral Salts Storage Room

This storage room contains caustics such as alkaline strippers and neutral salts. A floor sump currently drains to the wastewater pretreatment system.

C. Toxic Gas/Cyanide Storage Room

This storage room contains toxic gas and cyanide. Cyanide was purposely separated from the acid and alkali storage rooms to avoid a toxic gas reaction.

D. Wet Processing Room

Circuit boards and computer components are manufactured in this room through etching and plating operations; whereby acidic, caustic, and metal wastes are generated. Typical rinse waters contain metal waste such as lead, chromium, tin, and copper. Corrosive wastes such as chromic/sulfuric acid, and phenol/alkaline strippers are also generated in this room. Below this room lies the secondary containment system. The grated floor drains any spills to the underlying floor pit and "Buck and Membrane Liner" sump. The Wastes generated in the wet processing room are sent to the hazardous waste storage rooms or the wastewater elementary neutralization pretreatment system described below. The Company is considering closing down this operation.

E. Wastewater Elementary Neutralization and Precipitation Pretreatment System

As mentioned previously, this unit is exempt from RCRA permitting requirements; however, is regulated by Minn. Rules pt. 7001.0520, subp. 3, item C. The system is used to precipitate metals from plating wastes and neutralize these wastes through a series of interconnected tanks and pipes. The system contains two (2), 10,000 gallon underground flow through tanks, discussed in item VII.6. below, that receive waste from floor trenches and plating operations.

F. Underground Flow Through Tanks

These two (2) 10,000 gallon USTs are used for neutralization as part of the wastewater pretreatment system. These units are identified on the attached September 14, 1990, Certification Regarding Potential Releases From SWMUs.

VIII. SWMU RELEASES AND OTHER AREAS OF CONCERN

RCRA PERMITTED UNITS - FACILITY STORAGE > 90 DAYS

A. Flammable Solvents Storage Room

No releases to the environment are known to have occurred from this room. There was a spill residue evident along several floor seams during the independent engineer's closure investigation. Concrete and soil borings were taken in this area and analyzed for organic solvents; results showed no significant contamination in the underlying soil. The concrete boring was resealed with cement grout.

B. Non-Flammable/Oxidizer Storage Room

No releases to the environment are known to have occurred from this room. The floor and trench areas were cleaned as part of closure decontamination.

C. Metal Hydroxide Sludge Storage Area

No releases to the environment are known to have occurred from this area. There was evidence of floor discoloration during the VSI. However, the independent engineer's certification determined that the floor had no indication of any significant residual contamination.

D. Toxic Waste Storage Area

No release to the environment are known to have occurred from this area located in the sub-basement. Again, the floor was discolored, but was certified clean by the independent engineer.

E. Underground Secondary Containment Tanks

To date, no release to the environment is known to have occurred from these two (2), 8,000 gallon USTs. Upon removal of the tanks this will be verified. The tanks were initially used between 1975 and 1980 as secondary containment system for the acid and alkali storage rooms. Presently they are used to collect waste waters from the plating operation. During the VSI it was observed that runoff was infiltrating down onto the tanks from a crack in the asphalt. There is some concern whether the tanks are corroded because of this occurrence. The Company has installed an asphalt dike to divert precipitation runoff away from the tanks.

NON-RCRA PERMITTED UNITS - GENERATOR STORAGE < 90 DAYS

A. Acid and Alkali Storage Rooms

No release to the environment is known to have occurred from these rooms. During the independent engineer's closure investigation, a peeled, white flaky material was found on the floor coating next to the walls and analyzed for acidity. Analytical results showed a pH of approximately nine (9), indicating some caustic waste was present on the floor. All flaked material was cleaned up prior to the engineer's certification.

B. Toxic Gas/Cyanide Storage Room

No release to the environment is known to have occurred from this room.

C. Wet Processing Room

The Company's September 14, 1990, Certification Regarding Potential Releases From SWMUs form indicates that the system had a release that occurred prior to 1985, from the plating operation's underlying secondary containment floor system. The release would have consisted of an unknown volume of plating waste, and chromic sulfuric etchant. There was a subsequent loss of the floor coating integrity. Consequently, portions of the floor were removed and a new "Buck and Membrane Liner" was installed in the sump. January 28, 1985, analysis for the contaminated concrete debris indicates that the concrete was Extraction Procedure Toxic for Chromium.

On June 23, 1990, Unisys submitted the plans and specifications documenting the design and installation of the "Buck and Membrane Liner" sump. Apparently no underlying soils beneath the corroded sump were tested prior to installation of the new sump. Ground water monitoring will continue; however, as indicated in part VI, the soils underlying the sump may be a source of the chromium detected in the ground water at the Facility.

At the time of the VSI the underlying secondary containment floor was flooded out. Wastes from the plating baths had overfilled the sump which normally would be pumping the plating wastes into the wastewater pretreatment system.

D. Wastewater Elementary Neutralization Pretreatment System

No release to the environment is known to have occurred from this system.

E. Underground Flow Through Tanks

No release to the environment is known to have occurred from these tanks.

IX. CONTIGUOUS PROPERTY INSPECTION

The area where the two (2), 8,000 gallon outside USTs are located was inspected. The asphalt dike and crack were observed along with existing ground water monitoring wells in the area. Locations for additional ground water monitoring wells were discussed with regard to monitoring water quality downgradient of the pretreatment sump.

X. SUMMARY AND RECOMMENDATIONS

The Company is currently developing an RFI Workplan. The RFI will incorporate much of the information presented in the September 16, 1988, Environmental Assessment Report and subsequent ground water monitoring data. Additional ground water monitoring wells are expected to be installed, to further define the extent of chromium contamination and ground water flow direction.

A Corrective Action Agreement will be developed if necessary pending the results of the RFI. This binding agreement will govern any remedial work after the Facility has closed and changed status to a Large Quantity Generator.

XI. REFERENCES

A. PRELIMINARY REVIEW

1. Existing Hazardous Waste Facility Permit Application
2. Existing Hazardous Waste Facility Permit
3. Hazardous Waste Annual Report
4. "Environmental Assessment of the Unisys Park Facility Eagan, Minnesota, September 16, 1988, prepared by Leggette, Brashears & Graham, Inc.

(LBG)

5. May 14, 1990, Pace workplan for closure certification by independent registered professional engineer
6. June 28, 1990, Pace closure certification report
7. September 14, 1990, Certification Regarding Potential Releases from SWMUs

B. VISUAL SITE INSPECTION

1. Company Representatives: Mark Wilson, Engineer
Mic LeVinski, Supervisor
Dan MacDonald, Engineer
2. MPCA staff: Dan Card, Engineer
Byron Adams, Hydrogeologist
Jennifer Volkman, Pollution Control Specialist

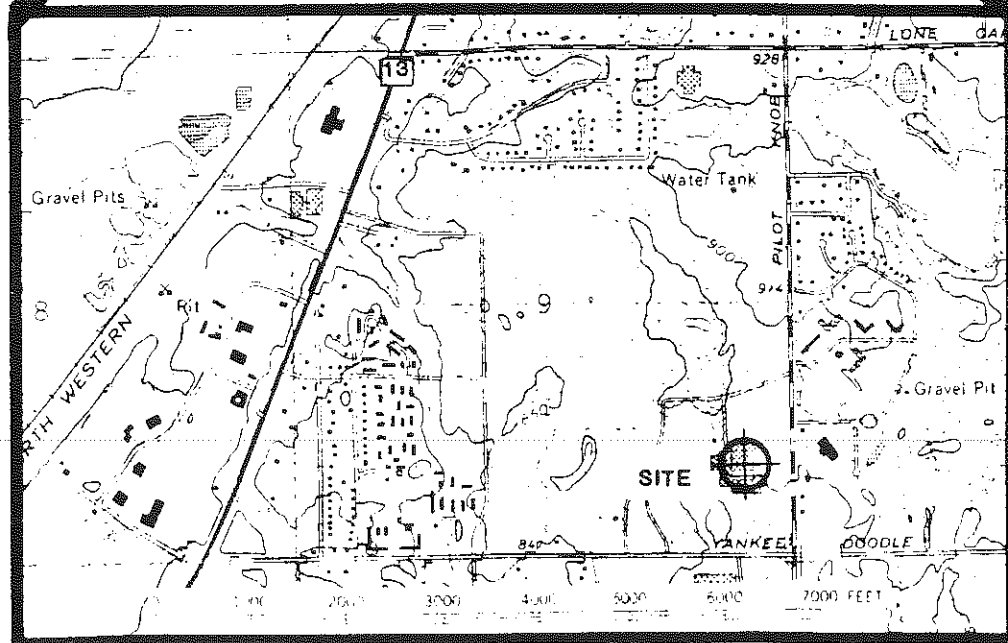


FIGURE 4

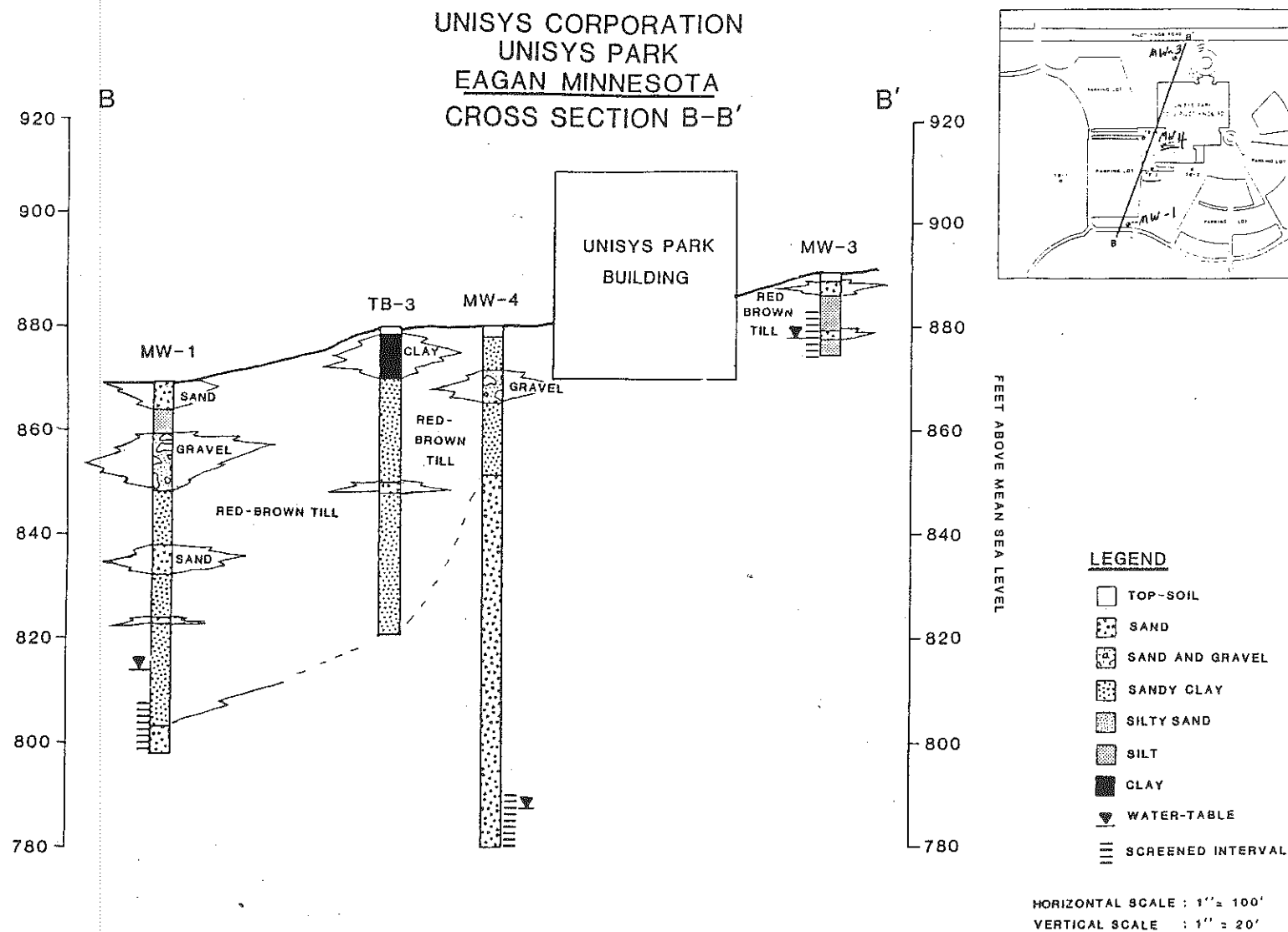


FIGURE 5

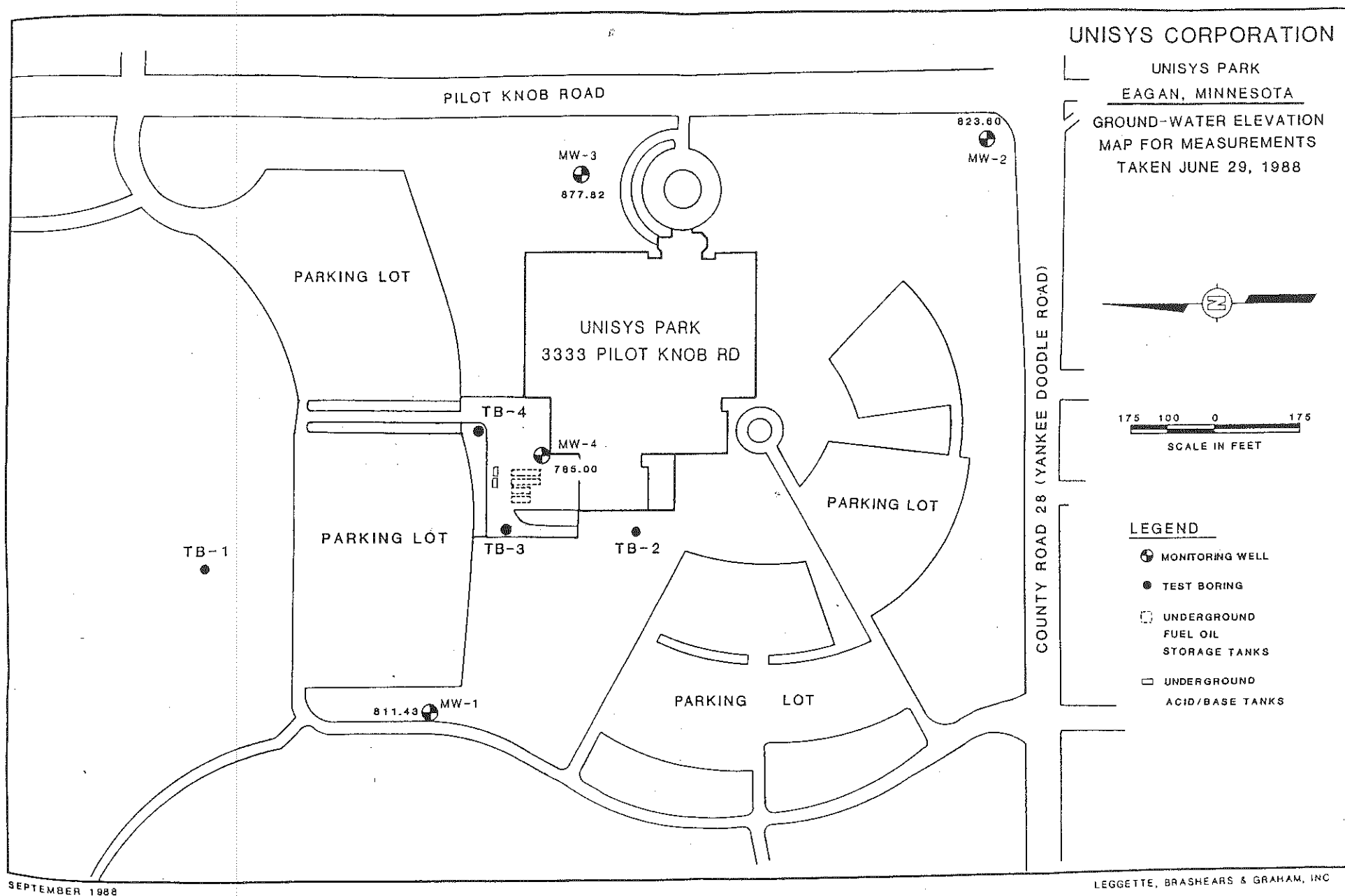
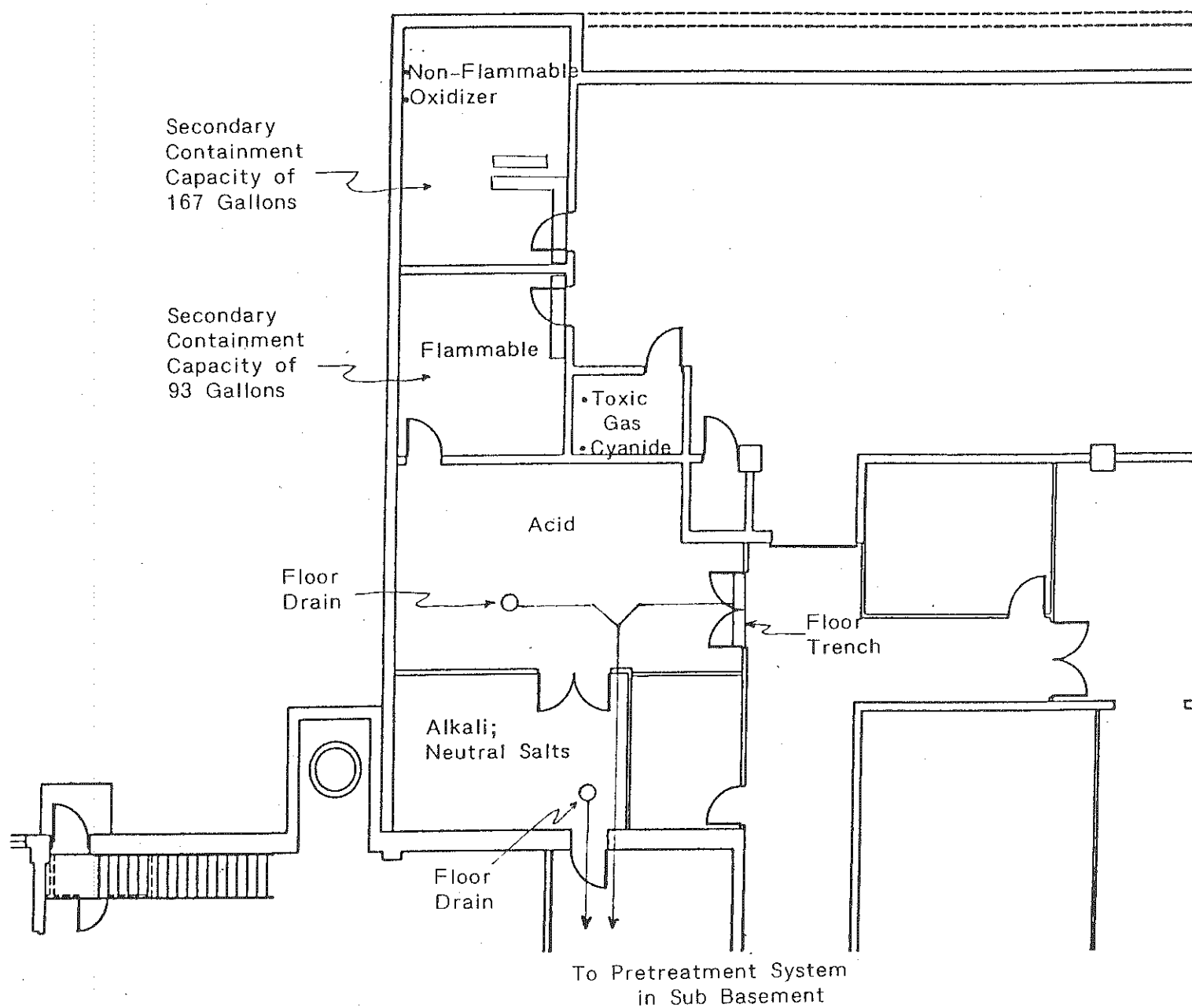


Figure D-2
SECONDARY CONTAINMENT



Unisys Park
Chemical Storage

Unisys Corporation
PO Box 64525
St Paul MN 55164-0525

Telephone
612 456 2222

September 14, 1990

RECEIVED

SEP 18 1990

MPCA, HAZARDOUS
WASTE DIVISION

RECEIVED

UNISYS

Mr. Dan Card
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155

Dear Mr Card,

Enclosed is the certification of potential release form as you requested in your letter. I have included a copy of the analysis of the concrete rubble which was excavated from the pit during the demolition. I have also included a property line drawing and a print of the portion of the building containing the plating lab and the waste treatment areas. These drawings were part of the original Part B submittal.

Sincerely,



Mark Wilson
Manager
Environmental Management
M.S.U1N14

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS
(CLOSURE PLAN REVIEW)

FACILITY NAME: Unisys Park

EPA I.D. NUMBER: MND000823914

LOCATION CITY: Eagan

STATE: Minnesota

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION and in your closure plan.

	<u>YES</u>	<u>NO</u>
• Landfill	<u> </u>	<u>X</u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u>X</u>	<u> </u>
• Storage Tank (Above Ground)	<u> </u>	<u>X</u>
• Storage Tank (Underground)	<u> </u>	<u>X</u>
• Container Storage Area	<u> </u>	<u>X</u>
• Injection Wells	<u> </u>	<u>X</u>
• Wastewater Treatment Units	<u>X</u>	<u> </u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u> </u>	<u>X</u>
• Other <u> </u>	<u> </u>	<u> </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

Incinerator is used for security document destruction only

waste is considered non-hazardous. Waste water treatment units consist

of a 25 GPM metal bearing system and a 50 GPM ph adjustment

system. The ph adjustment system includes two 10,000 gallon underground

flow through tanks.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII Of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application and in your closure plan. please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released .
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

a) Date of release prior to 1985 b) Plating waste, chronic sulfuric etchant c) Unknown volumn d) Loss of structural integrity of floor coating.

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases, Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

Attached analysis of concrete rubble from plt floor indicates level of contamination at that point.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Mark Wilson, Manager, Env. Management

Typed Name and Title

Mark Wilson
Signature

9/14/90

Date

CHEMICAL ANALYSES REQUEST FORM

Date 1/29/85
Request No. 1464

Work Order Number _____

Requested by MARK WILSONSample Description RUBBLE FROM PLATING PIT FLOORSpecial Instructions USE EPA LEACHATE TESTAnalysis
RequiredResultAnalysis
RequiredResult

Ag		Oil		pH	
Alkalinity		Pb	X	Comp.	
Cd		Phenol		1	
Cl		PO ₄		2	
CO ₂		Si		3	
COD		Sn		4	
CN, Total		SO ₄		5	
Cr, Total	X	SS		6	
Cr, +6		TS		7	
Cu		Zn		8	
Fe		pH		9	
Hardness, Total		Fl		10	
Hg		NO ₃		11	
Mg				12	
Mn				13	
Na				14	
Ni				15	
				16	
				17	
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				31	

See
other
side

4220

Aqueous solution (24) analysed
by AA gave

Pb - 0.8 ppm

Cr - 30 ppm. \rightarrow EP TOXIC \Rightarrow HW

Used 105 g. of crushed sample
from about 2 Kg of original
sample. The 2 Kg crushed sample
was reduced by ASTM halving
procedure.

$$30 \text{ ppm} = 30 \text{ mg/L} = 60 \text{ mg of Cr}$$

$$\frac{60 \text{ mg}}{105 \text{ g}} = 0.57 \text{ mg Cr/g of sample}$$

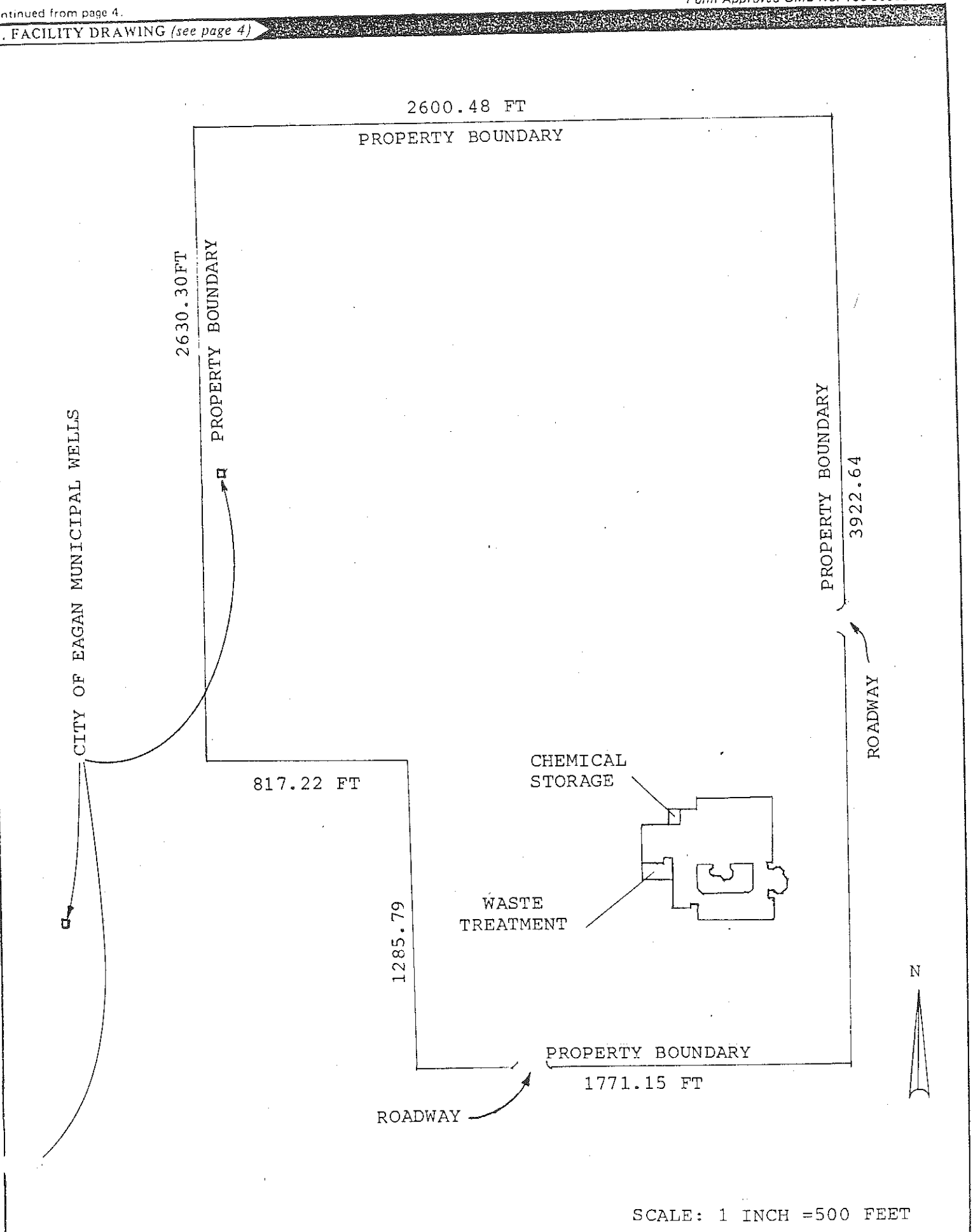
$$0.8 \text{ ppm} = 0.8 \text{ mg/L} = 1.6 \text{ mg of Pb}$$

$$\frac{1.6 \text{ mg}}{105 \text{ g}} = 0.015 \text{ mg Pb/g of sample}$$

Jellison
2/5/85

Continued from page 4.

V. FACILITY DRAWING (see page 4)



SCALE: 1 INCH = 500 FEET

UNISYS

RECEIVED

JUL 02 1990

MPCA, HAZARDOUS
WASTE DIVISION

June 28, 1990

Roger Bjork, Program Administrator
Hazardous Waste Division
Regulatory Compliance Section
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155

Dear Mr. Bjork:

RE: Closure of the Unisys Park facility (MND000823914)

Enclosed is the certification of closure by an independent professional engineer stating that this facility is closed as a hazardous waste storage facility.

I have been trying to set up a meeting with Dan Card and Byron Adams to discuss the ground water issue at this facility.

If you have any questions or need additional information please give Mark Wilson call at 456-4220.

Sincerely,



Greg Weisjahn
Environmental Management

CC George Kinney Dakota County

June 25, 1990

Mr. Greg P. Weisjahn
Environmental Engineer
Unisys Corporation
Sperry Park
P.O. Box 64525, MSU1N14
St. Paul, MN 55164-0525

RE: Hazardous Waste Storage Area Closure Certification

Dear Mr. Weisjahn:

I have prepared this letter to describe my inspection on May 29, 1990 of the hazardous waste storage areas at the Unisys facility, convey the results of analysis performed on one soil sample and provide a final closure certification for the hazardous waste storage areas. The workplan for closure of the storage areas was established in my letter to you dated May 14, 1990. The activities performed to execute the closure generally followed the task description provided there. Photographs to depict the areas at the time of closure were provided by Unisys and accompany this letter. By June 1, 1990, storage of containers of hazardous wastes for periods greater than 90 days was discontinued.

1. Chlorinated Organic Solvent Storage Area.

Prior to my site visit on May 29, Unisys personnel cleaned the floor and trough areas near the locations where chlorinated organic solvent wastes were stored in the past. Residues from that cleaning process were containerized with compatible chlorinated organic hazardous waste streams generated at the facility for disposal. At the time of my inspection the surfaces had been cleaned and exhibited no apparent significant residues. The concrete plug in the trough drain was visible. Photograph #1 attached depicts the areas which were cleaned as seen looking west from the doorway. Photograph #2 depicts the same areas looking south from within the room.

This room will continue to be used for storage of new chlorinated chemical products and storage of hazardous waste for periods of less than 90 days, in compliance with the hazardous waste generator standards. I understand that the outdoor underground storage tank is empty and will be removed possibly later this year or next.

2. Wastewater Treatment Storage Areas

On May 29, 1990 during my site visit I inspected the two small areas where wastewater treatment residuals, and miscellaneous hazardous

wastes had been stored. Both of those areas had been cleaned by Unisys personnel and the residues from cleaning had been processed through the facility wastewater treatment system. The floors in each area exhibited some coloration, however, there was no indication that any significant residual contamination was present. Photographs #3 and #4 attached depict those floor areas. These two areas will continue to be used for storage of containers of hazardous waste generated on site subject to a 90 day time limit for generators of hazardous waste.

3. Flammable Storage Area

At the time of my inspection on May 29, the area where flammable hazardous wastes had been stored had been cleaned by Unisys personnel. The resulting residues had been containerized with compatible flammable hazardous wastes generated on-site for disposal. Photograph attached as #5 was taken by Unisys personnel after the area had been cleaned but prior to their removal of a concrete core for soil sampling. Sampling was recommended to ensure that spill residue visible at a concrete seam had not caused contamination of the soil below that point.

On May 29, a PACE technician used a stainless steel hand auger to collect soil samples from the first 2 feet below the concrete in the flammable storage area. A sample from the 2 foot depth was analyzed for a wide variety of non-halogenated organic compounds by GC/MS. During sampling, the soil samples were observed to be dry, and had no odor. The attached report of laboratory analysis indicates that no measurable levels of any of the parameters tested were detected in the laboratory analysis. It should be noted, however, that the sample was analyzed at our laboratory after the prescribed holding time had lapsed. Since the holding time was exceeded, this data can not be considered absolutely authoritative. Unisys will not be charged for this analysis. Based on the observations made on site and the absence of odors in the soil, we believe the analytical results are useful to confirm that no significant contamination is present in the soil below the concrete seams in the flammable storage area.

After the samples were collected by PACE personnel, the concrete was resealed with cement grout by Unisys. The letter you provided on June 1, 1990 along with photograph #6 confirmed that activity. In the future, this room will continue to be used to store flammable products and hazardous waste subject to the 90 day time limit.

4. Caustic Storage Area

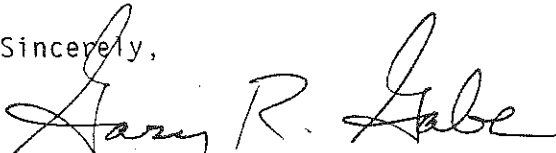
During my site visit on May 29, 1990 we examined the caustic storage area. At that time, we observed that some of the flaked residue

seen before may in fact be paint chips from surrounding walls. We gathered some of those chips and placed approximately 10 mls of the chips in approximately 50 mls of tap water and checked the pH. The pH of the mixture was approximately 9, indicating some caustic was likely present on the floor in the areas as would be anticipated. Based on our observations on site, the quantity of caustic material present must be small. As a result, I recommended that the peeled flooring material and white flaky residue be scraped off and the residues disposed with other compatible hazardous waste generated on site. In your June 1 letter, you indicated to me that the area had been cleaned up and photograph #7 was provided to depict the area after cleaning. Caustic products will continue to be stored in this area.

With these activities completed, I certify that closure activities for these areas which comprise the hazardous waste storage facility have been successfully completed.

If you have questions regarding this letter, the activities performed, or any of the attached information, please contact me.

Sincerely,



Gary R. Gabe, P.E.
Senior Environmental Engineer

GRG354/alr

Enclosures: May 14, 1990 Closure Workplan
Photographs
June 1, 1990 letter
PACE Laboratory Report



REPORT OF LABORATORY ANALYSIS

Unisys Corporation
Sperry Park, MS-UIN14
P.O. Box 64525
St. Paul, MN 55164-0525

June 25, 1990
PACE Project
Number: 900529201

Attn: Mr. Greg Weisjahn

Closure

PACE Sample Number: 10 0206741
Date Collected: 05/29/90
Date Received: 05/29/90
Parameter Units MDL 2.0 Ft.

ORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Moisture content % 1.0 8.5

GCMS FOR VOLATILE ORGANICS-8240

Date Analyzed 06/18/90(1)

Chloromethane	mg/kg	0.6	ND
Bromomethane	mg/kg	1.0	ND
Vinyl chloride	mg/kg	0.7	ND
Chloroethane	mg/kg	0.5	ND
Methylene chloride	mg/kg	1.2	ND

Acetone	mg/kg	1.2	ND
Carbon disulfide	mg/kg	0.6	ND
1,1-Dichloroethylene	mg/kg	0.7	ND
1,1-Dichloroethane	mg/kg	0.5	ND
Trans-1,2-dichloroethylene	mg/kg	0.5	ND
Chloroform	mg/kg	0.5	ND

1,2-Dichloroethane	mg/kg	0.5	ND
2-Butanone (MEK)	mg/kg	1.2	ND
1,1,1-Trichloroethane	mg/kg	0.5	ND
Carbon tetrachloride	mg/kg	0.5	ND
Vinyl acetate	mg/kg	1.2	ND
Bromodichloromethane	mg/kg	0.5	ND

1,1,2,2-Tetrachloroethane	mg/kg	0.3	ND
1,2-Dichloropropane	mg/kg	0.4	ND
Trans-1,3-dichloropropene	mg/kg	0.3	ND
Trichloroethylene	mg/kg	0.5	ND
Dibromochloromethane	mg/kg	0.4	ND

MDL Method Detection Limit
ND Not detected at or above the MDL.
(1) This sample analyzed outside of 14 day volatile holding time.

REPORT OF LABORATORY ANALYSIS

Mr. Greg Weisjahn
Page 2

June 25, 1990
PACE Project
Number: 900529201

Closure

PACE Sample Number: 10 0206741
Date Collected: 05/29/90
Date Received: 05/29/90
Parameter Units MDL 2.0 Ft.

ORGANIC ANALYSIS

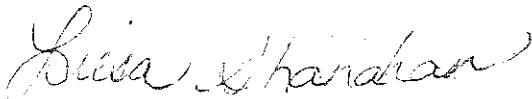
GCMS FOR VOLATILE ORGANICS-8240

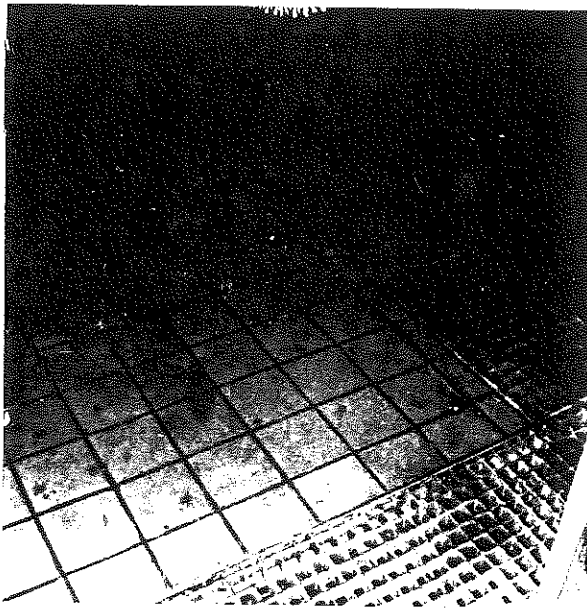
1,1,2-Trichloroethane	mg/kg	0.4	ND
Benzene	mg/kg	0.3	ND
Cis-1,3-dichloropropene	mg/kg	0.3	ND
2-Chloroethylvinyl ether	mg/kg	1.2	ND
Bromoform	mg/kg	0.5	ND
2-Hexanone	mg/kg	1.2	ND
4-Methyl-2-pentanone (MIBK)	mg/kg	1.2	ND
Tetrachloroethylene	mg/kg	1.0	ND
Toluene	mg/kg	0.5	ND
Chlorobenzene	mg/kg	0.4	ND
Ethyl benzene	mg/kg	0.5	ND
Styrene	mg/kg	0.6	ND
Xylenes, (total)	mg/kg	0.6	ND

MDL Method Detection Limit
ND Not detected at or above the MDL.

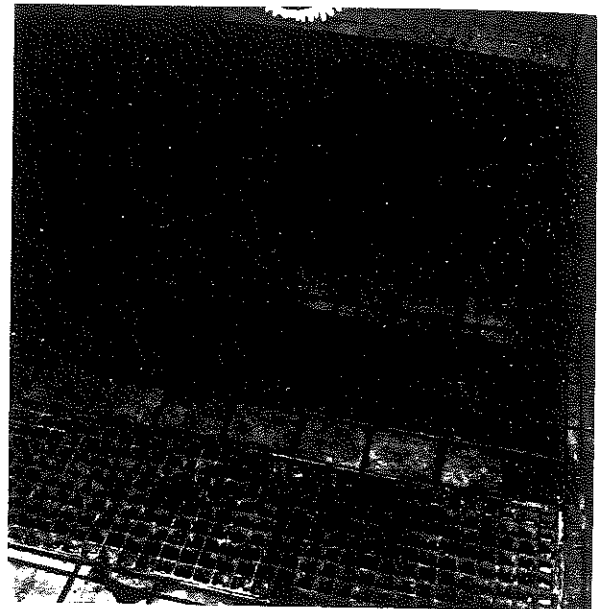
The analyses of soil samples were performed 'as received' and do not reflect analyses on a dry weight basis unless indicated.

The data contained in this report were obtained using EPA or other approved methodologies. All analyses were performed by me or under my supervision.

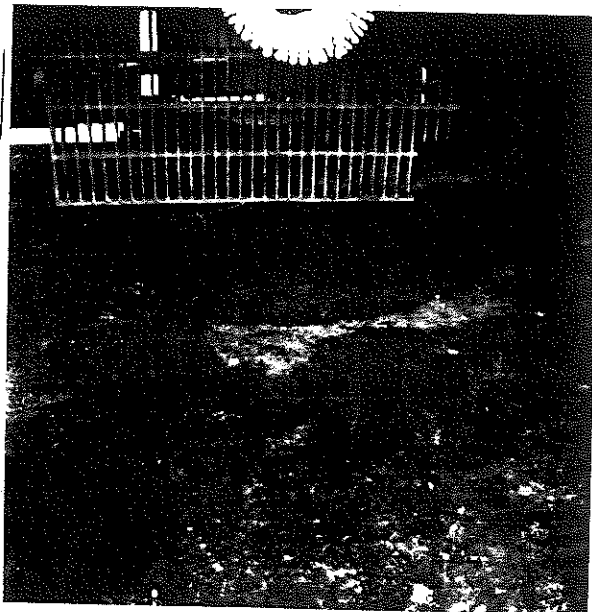

Liesa A. Shanahan
Organic Chemistry Manager



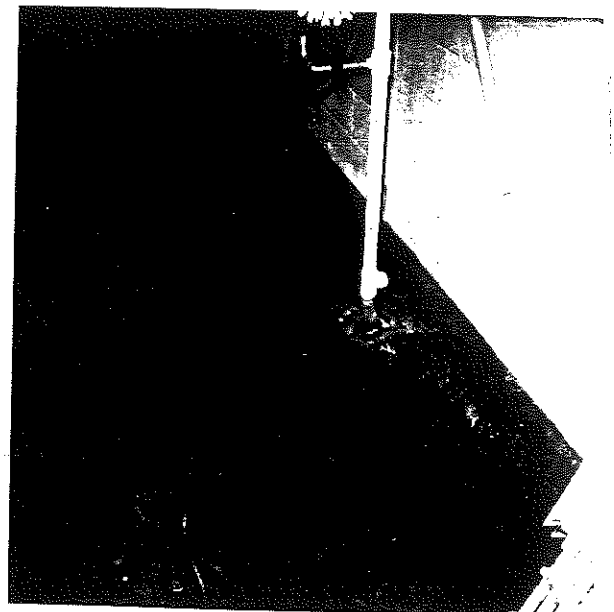
PHOTOGRAPH 1 Chlorinated organic storage area after cleaning (looking west from door)



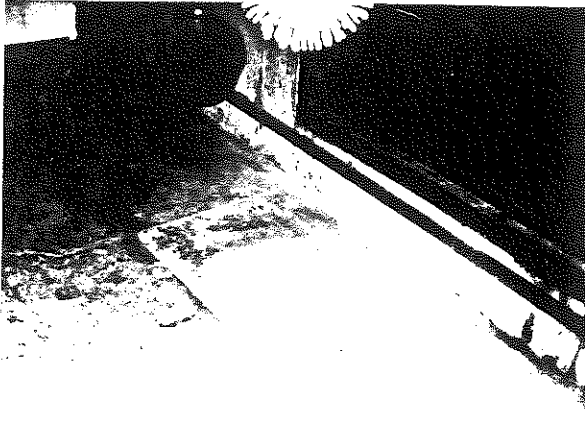
PHOTOGRAPH 2 Chlorinated organic storage area after cleaning (inside looking south)



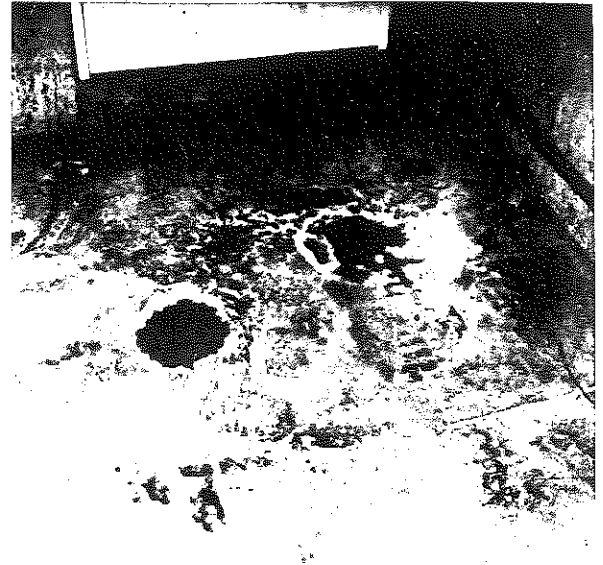
PHOTOGRAPH 3 Wastewater treatment system storage area after cleaning



PHOTOGRAPH 4 Wastewater treatment system storage area after cleaning



PHOTOGRAPH 5 Flammable storage room floor after cleaning (looking south)



PHOTOGRAPH 6 Flammable storage room floor showing grouted soil sampling location (looking south)



PHOTOGRAPH 7 Caustic storage area floor after cleaning



SPERRY CORPORATION
DEFENSE PRODUCTS GROUP
SPERRY PARK, P.O. BOX 64525
ST. PAUL, MINNESOTA 55164-0525
TELEPHONE (612) 456-2222

RECEIVED

JUL 16 1985

SWB-AIS
U.S. EPA, REGION V

July 10, 1985

Mr. David A. Stringham
United States Environmental Protection Agency
Region V RCRA Activities
P.O. Box A3587
Chicago, IL 60690

Re: Certification Regarding Corrective Action
Sperry Corporation
Sperry Park Facility
MND-000-823-914

Dear Mr. Stringham:

Enclosed is the certification regarding releases from
solid waste management units for our facility
(MND000823914) which you requested.

A handwritten signature in dark ink, appearing to read "Roger J. Martin".

Roger J. Martin
Manager
Environmental Management

/lmk

cc: Ross Ohman - MPCA

COPY 2

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Sperry Corporation, Defense Products Group;
Sperry Park Facility
EPA I.D. NUMBER: MND000823914
LOCATION CITY: Eagan
STATE: Minnesota

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	<u>YES</u>	<u>NO</u>
• Landfill	<u> </u>	<u>X</u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u> </u>	<u>X</u>
• Storage Tank (Above Ground)	<u> </u>	<u>X</u>
• Storage Tank (Underground)	<u> </u>	<u>X</u>
• Container Storage Area	<u> </u>	<u> </u> (Included in Part B)
• Injection Wells	<u> </u>	<u>X</u>
• Wastewater Treatment Units	<u>X</u>	<u> </u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u> </u>	<u>X</u>
• Other <u> </u>	<u> </u>	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

We have a waste water pretreatment facility for treatment of
metal finishing wastes. We are permitted through the Metro-
politan Waste Control Commission for this installation.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

No releases have occurred in the past and none are occurring
at the present time.

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

Not applicable.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Roger J. Martin
Manager, Environmental Management

Typed Name and Title


Signature

7/10/85
Date



SPERRY CORPORATION
DEFENSE PRODUCTS GROUP
SPERRY PARK P.O. BOX 64525
ST. PAUL, MINNESOTA 55164-0525



Mr. David A. Stringham
United States Environmental Protection Agency
Region V RCRA Activities
P.O. Box A3587
Chicago, IL 60690



RCRA FACILITY REVIEW FOR SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: The Sperry Corporation
EPA ID NUMBER: MND000823914
LOCATION (CITY, STATE): Eagan, Minnesota
DATE OF INSPECTION: June 14, 1985
INSPECTOR(S): Ross Ohman, Nancy Misra
TITLE(S): (Engineer) (PCS)
FACILITY REPRESENTATIVES PRESENT: Roger Martin, Don McDonald

1. Based on a review of State records, describe any land disposal units that have ever had a State permit for managing municipal or industrial (non-hazardous) waste at this site. Summarize the information which is available to indicate whether the waste may contain hazardous constituents and whether the unit may be leaking.

State records reveal no land disposal units for this facility through July 22, 1985.

2. Based on a review of State records, describe any incinerators or other solid waste management units at this site (other than those treatment, storage and disposal units that have interim status) for which a State air pollution control permit has been issued. Summarize the information which is available to indicate whether the waste may contain hazardous constituents, and whether and whether the emissions from the unit may contain hazardous constituents.

State records reveal no indication of incinerators or any other units which may require a State air pollution permit through July 22, 1985.

3. Based on a review of State records (including CERCLA 103(c) notifications, complaints from the public, etc.) describe any known, suspected or likely releases of hazardous constituents to the environment from solid waste management units, except those spills not related to a specific unit, which were properly reported and cleaned up.

State records reveal no applicable notifications, complaints or allegations regarding any past releases or spills from this facility through July 22, 1985.

4. Based on State records, describe any permitted injection wells at this facility and indicate whether injected the wastes may contain hazardous waste or hazardous constituents. Summarize the information which is available to indicate whether hazardous constituents may be escaping to the environment through improperly constructed or managed injection wells.

Review of State records reveal no injection wells at this facility through July 22, 1985.

5. Did you see any of the following solid waste management units or evidence of prior existence of such a unit at the facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN THE PART B APPLICATION

	<u>YES</u>	<u>NO</u>
° Landfill	<u> </u>	<u>X</u>
° Surface Impoundment	<u> </u>	<u>X</u>
° Land Farm	<u> </u>	<u>X</u>
° Waste Pile	<u> </u>	<u>X</u>
° Incinerator	<u> </u>	<u>X</u>
° Storage Tank (Above Ground)	<u> </u>	<u>X</u>
° Storage Tank (Underground)	<u> </u>	<u>X</u>
° Container Storage Area	<u> </u>	<u> </u>
° Injection Wells	<u> </u>	<u>X</u>
° Wastewater Treatment Units	<u>X</u>	<u> </u>
° Transfer Stations	<u> </u>	<u>X</u>
° Waste Recycling Operations	<u> </u>	<u>X</u>
° Waste Treatment, Detoxification	<u> </u>	<u>X</u>
° Other <u> </u>	<u> </u>	<u>X</u>

Incl. Part B

6. If there are "Yes" answers to any of the items in Number 5 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available. You may simply reference the owner or operator's "Certification Regarding Potential Releases from Solid Waste Management Units" if the description contained therein appears to be accurate.

Inspection reveals waste water pretreatment equipment which are exempt under Minn. Rules pt. 7045.0450, subp. 3, item E. However, Sperry does have a waste water discharge permit from the Metropolitan Waste Control Commission.


7. If previous inspection reports indicated the presence of solid waste management units other than those described above, what is known about them?

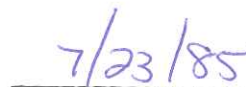
No other solid waste management units revealed through July 22, 1985.

8. Describe other information about existing or closed solid waste management units at this facility that should be considered in determining whether there may be a continuing release of hazardous waste or hazardous constituents from solid waste management units.

State records reveal no other pertinent information regarding any closed or existing solid waste management units at this facility through July 22, 1985.

Ross L. Ohman, Staff Engineer, Hazardous Waste Permit and Review Unit
~~Typed or Printed Name - State Permit Writer~~


Signature - State Permit Writer


Date

